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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
16 MERCEDES-BENZ VEHICLES, ET  
AL.,  
  
Defendants.

SYNERGY TRADING CORPORATION  
  
Claimant.

No. CV 13-07877-GW(JCx)

**CONSENT JUDGMENT**

1 IT IS HEREBY STIPULATED AND AGREED by and among plaintiff  
2 United States of America and claimant Synergy Trading  
3 Corporation ("Synergy"), as follows:

4 On March 7, 2014, plaintiff United States of America  
5 (hereafter, "plaintiff" or "government") filed an Amended  
6 Verified Complaint for Forfeiture (the "FAC") alleging that the  
7 defendants were subject to forfeiture pursuant to 18 U.S.C.  
8 § 981(a)(1)(C). Notice was given and published according to  
9 law. The defendants are:

10 a. one 2013 Porsche Cayenne Turbo, Vehicle  
11 Identification Number WP1AC2A28DLA91738;

12 b. one 2013 Porsche Cayenne Diesel, Vehicle  
13 Identification Number WP1AF2A28DLA28971;

14 c. one 2013 Porsche Cayenne Turbo, Vehicle  
15 Identification Number WP1AC2A28DLA90430;

16 d. one 2013 Porsche Panamera GTS, Vehicle  
17 Identification Number WP0AF2A72DL076219;

18 e. one 2013 Porsche Panamera GTS, Vehicle  
19 Identification Number WP0AF2A76DL076398;

20 f. one 2013 Mercedes Benz GL 550, Vehicle  
21 Identification Number 4JGDF7DEXDA170599;

22 g. one 2013 Mercedes Benz GL 550, Vehicle  
23 Identification Number 4JGDF7DE2DA170628;

24 h. one 2013 Mercedes Benz GL 550, Vehicle  
25 Identification Number 4JGDF7DE2DA167812;

26 i. one 2013 Mercedes Benz GL 550, Vehicle  
27 Identification Number 4JGDF7DE0DA170126;  
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1           j.     one 2013 Mercedes Benz GL 550, Vehicle  
2 Identification Number 4JGDF7DE0DA175844;

3           k.     one 2013 Mercedes Benz GL 550, Vehicle  
4 Identification Number 4JGDF7DE2DA161329;

5           l.     one 2013 Mercedes Benz GL 550, Vehicle  
6 Identification Number 4JGDF7DE7DA159611;

7           m.     one 2013 Mercedes Benz GL 550, Vehicle  
8 Identification Number 4JGDF7DE1DA158566;

9           n.     one 2013 Mercedes Benz GL 550, Vehicle  
10 Identification Number 4JGDF7DE0DA188707;

11          o.     one 2013 Mercedes Benz GL 350 BTC, Vehicle  
12 Identification Number 4JGDF2EEXDA170412;

13          p.     one 2013 Mercedes Benz GL 350 BTC, Vehicle  
14 Identification Number 4JGDF2EE0DA164991;

15          q.     one 2013 Mercedes Benz GL 350 BTC, Vehicle  
16 Identification Number 4JGDF2EE3DA204223;

17          r.     one 2013 Mercedes Benz GL 350 BTC, Vehicle  
18 Identification Number 4JGDF2EE2DA170212;

19          s.     one 2013 Mercedes Benz C 350 W, Vehicle  
20 Identification Number WDDGF5HB2DA774465;

21          t.     one 2013 Mercedes Benz CLS 63 AMG, Vehicle  
22 Identification Number WDDLJ7EB7DA072137;

23          u.     one 2013 Mercedes Benz C 63 AMG, Vehicle  
24 Identification Number WDDGF7HB5DA799937; and

25          v.     one 2013 Porsche Cayenne GTS, Vehicle  
26 Identification Number WP1AD2A20DLA78124 (collectively, the  
27 "defendant vehicles").  
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1 Synergy timely filed a verified claim and answer to contest  
2 the forfeiture of the defendant vehicles, and asserted that it  
3 was an innocent owner of the defendant vehicles. No other  
4 claims or answers have been filed in this action, and the time  
5 for filing claims and answer has expired.

6 The government and Synergy have agreed to settle this  
7 action and have asked the Court to enter this Consent Judgment.

8 The Court, having been duly advised of and having  
9 considered the matter, and based upon the mutual consent of the  
10 parties,

11 HEREBY ORDERS, ADJUDGES, AND DECREES THAT:

12 1. This Court has jurisdiction over the subject matter of  
13 this action and the parties to this Consent Judgment of  
14 Forfeiture.

15 2. The Complaint for Forfeiture states a claim for relief  
16 pursuant to 18 U.S.C. § 981(a)(1)(C).

17 3. Notice of this action has been given and published as  
18 required by law.

19 4. The United States shall return the following  
20 defendant vehicles to Synergy according to paragraph 6 below:

21 a. one 2013 Porsche Cayenne Turbo, Vehicle  
22 Identification Number WP1AC2A28DLA91738;

23 b. one 2013 Porsche Panamera GTS, Vehicle  
24 Identification Number WP0AF2A72DL076219;

25 c. one 2013 Mercedes Benz GL 550, Vehicle  
26 Identification Number 4JGDF7DEXDA170599;

1 d. one 2013 Mercedes Benz GL 550, Vehicle  
2 Identification Number 4JGDF7DE2DA170628;

3 e. one 2013 Mercedes Benz GL 550, Vehicle  
4 Identification Number 4JGDF7DE2DA161329;

5 f. one 2013 Mercedes Benz GL 550, Vehicle  
6 Identification Number 4JGDF7DE7DA159611; and

7 g. one 2013 Mercedes Benz GL 550, Vehicle  
8 Identification Number 4JGDF7DE1DA158566 (collectively, the  
9 "released vehicles").

10 5. The remaining defendant vehicles (that is, all of the  
11 defendant vehicles other than those described in paragraph 4  
12 above) are forfeited to the United States and no other right,  
13 title or interest shall exist therein. The forfeited assets  
14 shall be disposed of according to law.

15 6. Within fourteen days of the entry of this Consent  
16 Judgment, the United States Secret Service shall make the  
17 property identified in paragraph 4 available to Synergy, or its  
18 designee, at the storage facility where the property is stored,  
19 which is located within the Central District of California.  
20 Synergy or its representative shall provide photo  
21 identification, and shall sign the disposition order and Form  
22 6051 as required by the Secret Service prior to, or concurrently  
23 with, the release of the property. Synergy shall not be  
24 responsible for any storage or other costs related to the  
25 released vehicles. The costs related to the remaining defendant  
26 vehicles shall be borne by the government. To the extent that  
27 the title documents for the released vehicles are in the  
28 possession or control of the Secret Service, the Secret Service

1 shall release said title documents to Synergy or its designee  
2 concurrently with the release of the released vehicles.

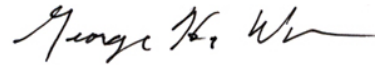
3 7. The Court finds the claimant did not substantially  
4 prevail in this action within the meaning of 28 U.S.C. § 2465,  
5 and each of the parties hereto shall bear its own attorneys'  
6 fees and costs. This judgment shall constitute a certificate of  
7 reasonable cause within the meaning of 28 U.S.C. § 2465(a)(2).

8 8. There being no just reason for delay, the clerk is  
9 hereby directed to enter this consent judgment, which  
10 constitutes a final judgment resolving this action as to all of  
11 the parties hereto, and all other potential claimants.

12 9. The Court retains jurisdiction over this case and the  
13 parties hereto to effectuate the terms of this Consent Judgment.

14 **IT IS SO ORDERED.**

15  
16 DATED: December 8, 2014



17 THE HONORABLE GEORGE H. WU  
18 UNITED STATES DISTRICT JUDGE  
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CONSENT

The parties hereto consent to the above judgment and waive any right of appeal of this judgment.

This consent judgment may be signed in counterparts and shall be construed as a single document.

DATED: December 3, 2014 STEPHANIE YONEKURA  
Acting United States Attorney  
ROBERT E. DUGDALE  
Assistant United States Attorney  
Chief, Criminal Division  
STEVEN R. WELK  
Assistant United States Attorney  
Chief, Asset Forfeiture Section

/s/ Lucas. E. Rowe  
LUCAS E. ROWE  
Special Assistant United States  
Attorney

DATED: December 3, 2014 BUEHLER & KASSABIAN, LLP

/s/ Mark Kassabain  
MARK KASSABIAN, ESQ.  
Attorney for Claimant  
SYNERGY TRADING CORPORATION

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